

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-01570 (GBD)(SN) ECF Case
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This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., 02-cv-06977
Gladys H. Salvo, et al. v. Al Qaeda Islamic Army, et al., 03-cv-05071
Federal Insurance Co., et al. v. Al Qaida, et al., 03-cv-06978
Thomas E. Burnett, Sr., at al. v. Al Baraka Inv. & Dev. Corp., et al., 03-cv-09849
Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-cv-01923
Continental Casualty Co., et al. v. Al Qaeda, et al., 04-cv-05970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., 04-cv-07065
Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-cv-07279

DECLARATION OF AISHA E. R. BEMBRY

I, Aisha E. R. Bembry, declare and say that the following statements are true as a matter of my personal knowledge:

1. I am a partner at the law firm of Lewis Baach Kaufmann Middlemiss PLLC and a member in good standing of the District of Columbia Bar and the Maryland Bar and have been admitted *pro hac vice* as counsel for defendants Muslim World League and the International Islamic Relief Organization. I make this declaration in support of the Memorandum of Law in Support of Defendants’¹ Joint Motion to Exclude Expert Testimony of Jonathan Winer and Brian Michael Jenkins in the above-captioned case, filed on November 15, 2021.

¹ “Defendants” means Dubai Islamic Bank, World Assembly of Muslim Youth and World Assembly of Muslim Youth International (collectively, “WAMY”), International Islamic Relief Organization (“IIRO”), Muslim World League (“MWL”), Dr. Abdullah Omar Naseef, Dr. Abdullah bin Saleh Al Obaid, Dr. Abdullah Abdelmohsen Al Turki, Dr. Adnan Basha, and Yassin Kadi.

2. Attached hereto are true and correct copies of the following documents:

Exhibit A	Expert Report of Jonathan M. Winer, dated March 10, 2020
Exhibit B	Rebuttal Report of Jonathan M. Winer, dated February 2, 2021
Exhibit C	The Road to 9/11: The September 11 Terrorist Attack on the World Trade Center, Brian Michael Jenkins, report dated March 10, 2020 (“Report of Brian Jenkins”)
Exhibit D	Catalog of Impermissible Testimony of Plaintiffs’ Experts Winer and Jenkins, with Exhibit 1 attached thereto
Exhibit E	Excerpt from telephone conference before the Honorable Sarah Netburn, September 29, 2021
Exhibit F	Compilation of excerpts from the transcripts of the deposition of Jonathan M. Winer ²
Exhibit G	Compilation of excerpts from the transcript of the deposition of Brian M. Jenkins
Exhibit H	Excerpt of the transcript of the deposition of Jimmy Gurulé
Exhibit I	Jonathan Winer – Reliance Material Chart
Exhibit J	Excerpt of Winer Deposition Exhibit 907
Exhibit K	Excerpt of Winer Deposition Exhibit 941
Exhibit L	IIRO 111692 - 99
Exhibit M	Winer Deposition Exhibit 925
Exhibit N	Winer Deposition Exhibit 946
Exhibit O	Jonathan Marks – Reliance Material

² As reflected in the letter from Kristie Martello of Golkow Litigation Services dated November 15, 2021, which is attached at Exhibit F hereto, despite the “confidential material” designation at the top of each page of the transcripts, the transcripts of the deposition of Jonathan M. Winer do *not* contain confidential material.

Exhibit P	February 2, 2021, Rebuttal Report of Jonathan Winer Reliance Materials and Materials Considered List
Exhibit Q	Winer Deposition Exhibit 914
Exhibit R	Winer Deposition Exhibit 915
Exhibit S	Winer Deposition Exhibit 916
Exhibit T	Winer Deposition Exhibit 919
Exhibit U	Winer Deposition Exhibit 920
Exhibit V	Winer Deposition Exhibit 922
Exhibit W	Winer Deposition Exhibit 923
Exhibit X	Winer Deposition Exhibit 909

Dated: November 15, 2021

/s/ Aisha E. R. Bembry

Aisha E. R. Bembry